

EXHIBIT 1

M. "Chip" De Preter

From: Maryam N. Hadden, Esq. <maryam.hadden@parlatorelawgroup.com>
Sent: Wednesday, October 11, 2023 8:13 AM
To: M. "Chip" De Preter; Sofia Quezada Hastings; Alex G. Patchen; Gina Kim
Subject: Amplify v CWA additional disclosures
Attachments: DeRidder-CWA_Affidavit.pdf; Waters-D.Patel-CWA-Affidavit.pdf; Waters-D.Long-CWA-Affidavit.pdf; Fast-Eddies_CWA_affidavit.pdf; Wyomissing-CWA_Affidavit.pdf; Pease.Chris-CWA_Affidavit.pdf; Sparkle-CWA_Affidavit.pdf; Duckys-CWA_Affidavit.pdf; Mr.-Magic_CWA_Affidavit.pdf

Counsel, attached please find just received additional disclosures. I'm currently stuck in an airport without the ability to bates stamp, my apologies. I will contact you and the court as soon as I know my next flight time.

Maryam

Sent from my iPhone

Maryam Hadden
Partner, Parlatore Law Group LLP
260 Madison Avenue, 17th Floor, New York, NY 10016
Direct Dial: (646)846-6382

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**Exhibit
23**

05/02/2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Louisiana)

) ss.

COUNTY OF Beauregard Parish)

Doug White, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of DeRidder Express Wash (located at 1309 N. Pine Street, DeRidder, LA 70634)

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2023, which closed on or about June 2023.

4. I first became familiar with CWA and Harry Caruso through a car wash manager referring me to Eric Harrison, an employee of Car Wash Advisory at the time. I first contacted CWA by calling Eric Harrison directly.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Doug White

Name: Doug White

Companies and / or Entities:

DeRidder Express Wash (located at 1309 N. Pine Street, DeRidder, LA 70634)

Dated: 2023-10-09

Signature Certificate

Reference number: YMOSC-TZH DU-ZKARU-CXD9A

Signer

Timestamp

Signature

Doug White

Email: white.doug@aol.com

Sent:

10 Oct 2023 02:56:31 UTC

Viewed:

10 Oct 2023 03:01:56 UTC

Signed:

10 Oct 2023 03:03:41 UTC

Doug White

Recipient Verification:

✓ Email verified

10 Oct 2023 03:01:56 UTC

IP address: 12.146.127.42

Location: Rayville, United States

Document completed by all parties on:

10 Oct 2023 03:03:41 UTC

Page 1 of 1



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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Illinois)

) ss.

COUNTY OF Cook County)

Mark Swanson, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of Metro Clean Ride, LLC (DBA Ducky's Car Wash) located at 3306 W. 51st St. Chicago, IL 60632 and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2023, which closed on or about July 14th, 2023.

4. I first became familiar with CWA and Harry Caruso through Car Wash Advisory's website of carwashadvisory.com. I first contacted CWA by submitting a form through carwashadvisory.com.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Mark Swanson

Name: Mark Swanson

Companies and / or Entities:

Metro Clean Ride, LLC (DBA Ducky's Car Wash) located at 3306 W. 51st St. Chicago, IL 60632

Dated: 2023-10-10

Signature Certificate

Reference number: KU4TB-FANJU-TUETN-BUBPT

Signer

Timestamp

Signature

Mark Swanson

Email: swanson.mt@gmail.com

Sent:

10 Oct 2023 16:55:30 UTC

Viewed:

10 Oct 2023 18:00:01 UTC

Signed:

10 Oct 2023 18:01:25 UTC

Mark Swanson

Recipient Verification:

✓ Email verified

10 Oct 2023 18:00:01 UTC

IP address: 98.212.49.89

Location: River Forest, United States

Document completed by all parties on:

10 Oct 2023 18:01:25 UTC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Maine)

) ss.

COUNTY OF Kennebec)

Edward R. Goff, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of Fast Eddie's Express Wash LLC. and Capital City Holdings, past or current legal owners of Fast Eddies Express Car Wash (Augusta and Brunswick Locations) located at 208 Western Ave, Augusta, ME 04330 and 139 Pleasant St, Brunswick, ME 04011, and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2021, which closed on or about December 7th, 2021

4. I first became familiar with CWA and Harry Caruso through reading an article Harry wrote. I first contacted CWA by phone.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Edward Goff

Name: Edward R. Goff

Companies and / or Entities:

Past Owner of Fast Eddie's Express Wash LLC. and Capital City Holdings

Dated: 2023-10-10

Signature Certificate

Reference number: MFH45-COZHK-ONPYM-OVDSU

Signer

Timestamp

Signature

Edward Goff

Email: ej_goff@hotmail.com

Sent:

10 Oct 2023 02:27:38 UTC

Viewed:

10 Oct 2023 13:10:07 UTC

Signed:

10 Oct 2023 13:13:12 UTC



Recipient Verification:

✓ Email verified

10 Oct 2023 13:10:07 UTC

IP address: 129.222.216.250

Location: New York, United States

Document completed by all parties on:

10 Oct 2023 13:13:12 UTC

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMPLIFY CAR WASH ADVISORS LLC :

Plaintiff, :

v. :

CAR WASH ADVISORY LLC, and
HARRY CARUSO, :

Defendants. :

Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Pennsylvania)

) ss.

COUNTY OF Allegheny County)

Alan Tiano, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of Mr. Magic Car Wash, Inc., a Pennsylvania corporation (“Mr. Magic”), Mr. Magic II, LLC, a Pennsylvania limited liability company (“Mr. Magic II”), TF Properties, LP, a Pennsylvania limited partnership (“TFP”), and JJ&A Properties, LLC, a Pennsylvania limited liability company, and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2021, which closed on or about December 2021.

4. I first became familiar with CWA and Harry Caruso through Harry Caruso calling

me and leaving me a voicemail. I first contacted CWA by calling him back over the phone.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Alan Tiano

Name: Alan Tiano

Companies and / or Entities:

Mr. Magic Car Wash, Inc., a Pennsylvania corporation (“Mr. Magic”)

Mr. Magic II, LLC, a Pennsylvania limited liability company (“Mr. Magic II”)

TF Properties, LP, a Pennsylvania limited partnership (“TFP”)

JJ&A Properties, LLC, a Pennsylvania limited liability company

Dated: 2023-10-10

Signature Certificate

Reference number: 6WBBV-XLTJP-JYV46-Z4JGF

Signer

Timestamp

Signature

Alan Tiano

Email: tiano.alan@gmail.com

Sent:

10 Oct 2023 02:36:58 UTC

Viewed:

10 Oct 2023 11:17:30 UTC

Signed:

10 Oct 2023 13:22:43 UTC



Recipient Verification:

✓ Email verified

10 Oct 2023 11:17:30 UTC

IP address: 100.6.111.28

Location: Pittsburgh, United States

Document completed by all parties on:

10 Oct 2023 13:22:43 UTC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Tennessee)

) ss.

COUNTY OF Knox County)

Chris Pease, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of Clean Machine Magic Carwash, LLC (located at 4315 Broadway Knoxville TN 37917, 4605 Chapman Hwy Knoxville TN 37920)

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2022, which closed on or about February 7th, 2023.

4. I first became familiar with CWA and Harry Caruso through Car Wash Advisory's website of carwashadvisory.com from google searching topics related to car wash valuations. I

first contacted CWA by submitting a form through carwashadvisory.com.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Chris Pease

Name: Chris Pease

Companies and / or Entities:

Clean Machine Magic Carwash, LLC (located at 4315 Broadway Knoxville TN 37917, 4605 Chapman Hwy Knoxville TN 37920)

Dated: 2023-10-10

Signature Certificate

Reference number: 2WXHC-IU9H7-CULTP-TATYX

Signer

Timestamp

Signature

Chris Pease

Email: chris.j.pease@icloud.com

Sent:

10 Oct 2023 15:07:27 UTC

Viewed:

10 Oct 2023 15:08:58 UTC

Signed:

10 Oct 2023 15:11:30 UTC

Chris Pease

Recipient Verification:

✓ Email verified

10 Oct 2023 15:08:58 UTC

IP address: 104.28.32.217

Location: Knoxville, United States

Document completed by all parties on:

10 Oct 2023 15:11:30 UTC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF South Carolina)

) ss.

COUNTY OF Richland County)

Dong K. Noh, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of
SK Sparkle LLC (located at 8601 Two Notch Rd., Columbia SC),

Car Wash Plus, LLC (located at 6212 Garners Ferry Rd., Columbia SC),

Nascar Xpress Car Wash, LLC (located at 4501 Hard Scrabble Rd., Columbia SC),

Car Wash One, LLC (located 7841 Garners Ferry Rd., Columbia SC),

SECW, LLC (located at 1010 Kinley Rd., Irmo SC),

SK Sparkle One, LLC (located at 3112 Augusta Rd. W., Columbia SC), and

SK Sparkle Three, LLC (located at 9350 Two Notch Rd., Columbia SC),

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2021, which closed on or about June 2022.

4. I first became familiar with CWA and Harry Caruso through reading a piece Harry Caruso wrote and published in an industry related online or written magazine about the car wash industry. I first contacted CWA by submitting an online form.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Doug Noh

Name: Dong K. Noh

Companies and / or Entities:

SK Sparkle LLC (located at 8601 Two Notch Rd., Columbia SC),

Car Wash Plus, LLC (located at 6212 Garners Ferry Rd., Columbia SC),

Nascar Xpress Car Wash, LLC (located at 4501 Hard Scrabble Rd., Columbia SC),

Car Wash One, LLC (located 7841 Garners Ferry Rd., Columbia SC),

SECW, LLC (located at 1010 Kinley Rd., Irmo SC),

SK Sparkle One, LLC (located at 3112 Augusta Rd. W., Columbia SC), and

SK Sparkle Three, LLC (located at 9350 Two Notch Rd., Columbia SC),

Dated: 2023-10-10

Signature Certificate

Reference number: 7XCGK-YVDBR-DSDHK-TFT8H

Signer

Timestamp

Signature

Dong Noh

Email: dongknoh@gmail.com

Sent:

10 Oct 2023 21:04:30 UTC

Viewed:

10 Oct 2023 21:29:24 UTC

Signed:

10 Oct 2023 21:30:38 UTC



Recipient Verification:

✓ Email verified

10 Oct 2023 21:29:24 UTC

IP address: 172.75.252.125

Location: Columbia, United States

Document completed by all parties on:

10 Oct 2023 21:30:38 UTC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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:

Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Florida

)

) ss.

COUNTY OF Orange County

)

Doug Long, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of USA Auto Wash, Inc., H.M. Patel, Inc., DD&D Group, Inc., KSA Equities, Inc., Strasser Wash, LLC, all in combination d.b.a. Waters Car Wash (located in and with primary place of business of Orlando Florida)

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2022, which closed on or about September 16th, 2022.

4. I first became familiar with CWA and Harry Caruso through an in-industry referral

who referred me to Harry Caruso and Car Wash Advisory. I first contacted CWA by submitting a form through carwashadvisory.com.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Doug Long

Name: Doug Long

Companies and / or Entities:

USA Auto Wash, Inc., H.M. Patel, Inc., DD&D Group, Inc., KSA Equities, Inc., Strasser Wash, LLC, all in combination d.b.a. Waters Car Wash (located in and with primary place of business of Orlando Florida)

Dated: 2023-10-10

Signature Certificate

Reference number: UP3EX-D5JFC-GFAAD-AOSFW

Signer

Timestamp

Signature

Doug Long

Email: douglongwash@gmail.com

Sent:

10 Oct 2023 14:49:45 UTC

Viewed:

10 Oct 2023 16:23:05 UTC

Signed:

10 Oct 2023 16:23:27 UTC



Recipient Verification:

✓ Email verified

10 Oct 2023 16:23:05 UTC

IP address: 66.177.246.18

Location: Stuart, United States

Document completed by all parties on:

10 Oct 2023 16:23:27 UTC

Page 1 of 1



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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Florida)

) ss.

COUNTY OF Orange County)

Don Patel, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of USA Auto Wash, Inc., H.M. Patel, Inc., DD&D Group, Inc., KSA Equities, Inc., Strasser Wash, LLC, all in combination d.b.a. Waters Car Wash (located in and with primary place of business of Orlando Florida)

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2022, which closed on or about September 16th, 2022.

4. I first became familiar with CWA and Harry Caruso through an in-industry referral

who referred me to Harry Caruso and Car Wash Advisory. I first contacted CWA by submitting a form through carwashadvisory.com.

5. I did not find, search for, or contact CWA using any of the domain names amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Don Patel

Name: Don Patel

Companies and / or Entities:

USA Auto Wash, Inc., H.M. Patel, Inc., DD&D Group, Inc., KSA Equities, Inc., Strasser Wash, LLC, all in combination d.b.a. Waters Car Wash (located in and with primary place of business of Orlando Florida)

Dated: 2023-10-10

Signature Certificate

Reference number: WDNFL-XOEIU-F4PXI-2MXNU

Signer

Timestamp

Signature

Don Patel

Email: donpatel23@yahoo.com

Shared via link

Sent:

10 Oct 2023 16:20:42 UTC

Viewed:

10 Oct 2023 16:26:15 UTC

Signed:

10 Oct 2023 16:26:53 UTC

Don Patel

IP address: 174.212.41.157

Location: Orlando, United States

Document completed by all parties on:

10 Oct 2023 16:26:53 UTC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMPLIFY CAR WASH ADVISORS LLC

Plaintiff,

v.

CAR WASH ADVISORY LLC, and
HARRY CARUSO,

Defendants.

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Case No. 22-cv-5612-JGK-OTW

AFFIDAVIT

STATE OF Pennsylvania)

) ss.

COUNTY OF Berks County)

Brennan Bressler, being duly sworn, deposes and says:

1. I am not a party in the above-captioned proceeding, nor do I have any interest in the outcome of the proceeding.

2. I am an authorized representative of and past or current owner of AutoSpa of Wyomissing (located at 2232 State Hill Road, Wyomissing, PA),

and as such, I am familiar with Defendants Car Wash Advisory LLC (CWA) and Harry Caruso.

3. I entered into a transaction involving CWA on behalf of the above business in the year 2022, which closed on or about January 2023.

4. I first became familiar with CWA and Harry Caruso through a mutual and shared personal acquaintance. I first contacted CWA by calling Harry Caruso via the phone.

5. I did not find, search for, or contact CWA using any of the domain names

amplifycarwash.com, amplifycarwashes.com, or amplifywashes.com and was not aware at the time that any of those domain names existed.

6. At no time prior to or during my interactions with CWA and Harry Caruso did I attempt to locate or contact anyone at CWA through “amplifycarwash.com”, “amplifycarwashes.com”, or “amplifywashes.com.”

Brennan Bressler

Name: Brennan Bressler

Companies and / or Entities:

AutoSpa of Wyomissing (located at 2232 State Hill Road, Wyomissing, PA)

Dated: 2023-10-10

Signature Certificate

Reference number: 2WWYC-Y4VQT-2RNUU-OHOHA

Signer

Timestamp

Signature

Brennan Bressler

Email: bdbressl@hotmail.com

Sent:

10 Oct 2023 02:47:21 UTC

Viewed:

10 Oct 2023 09:57:55 UTC

Signed:

10 Oct 2023 18:57:06 UTC



Recipient Verification:

✓ Email verified

10 Oct 2023 09:57:55 UTC

IP address: 166.196.103.71

Location: Philadelphia, United States

Document completed by all parties on:

10 Oct 2023 18:57:06 UTC

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